



Pennsylvania Department of Environmental Protection

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Bureau of Watershed Management

717-787-5267

VIA EMAIL [larry.j.prather@usace.army.mil](mailto:larry.j.prather@usace.army.mil)

Larry J. Prather  
Assistant Director of Civil Works  
HQUSACE  
Attn: P&G Revision, CECW-ZA  
441 G Street, NW  
Washington, DC 20314-1000

Dear Mr. Prather:

Thank you for the opportunity to review and comment on the Proposed Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies. We appreciate the readily apparent thought and effort that went into their preparation. We welcome the watershed basis for your national purpose and planning process and look forward to a more detailed explication as you proceed. We applaud the new preference for non-structural solutions.

As you set the basic framework through the immediate review, we have several concerns and questions, particularly about the current language that muddies the trust responsibilities of the states for their natural resources and the common law rights of individual property owners. Even though we realize that such language has been used historically, continued use of phrases such as an "implementable national water resources plan" under 9.1, and the "Nation's resources" and "Nation's water resources" in 2. National Planning Objective, are at best unfortunate phraseology, or imply a surprising reach in national responsibility for natural resources.

The confusion may be ours, but we would appreciate further detailing of Overview (1)--specification of problems and opportunities, as it is determined who exactly initiates and identifies the priority projects. Again, it is important not to federalize state trust responsibilities and private rights.

We are also concerned that the planning process not become so detailed and expensive that implementation becomes problematic, bearing on our past experiences with recommendatory plans, prohibitively expensive projects, and unavailable funding.

Your use of multiple required accounts is commendable in consideration of full costs. We are particularly pleased to see the inclusion of Regional Economic Effects, since past Pennsylvania proposals for areas of large affected populations, but low property values, had difficulty achieving the necessary ratios for consideration. We do wonder if mention should be made whether or not the accounts are listed in order of priority, which would make the current placement of Environmental Quality problematic. The accounts as listed also seem to diminish the human position squarely within



the environment. An improvement to "Public Safety" would include a Human Health component and removal of health from "Other Social Effects".

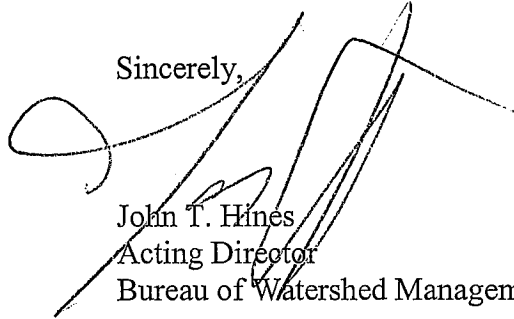
Because of the subjective nature of much of the economic valuation process, we have a strong preference, along with the others responders from Pennsylvania, for the existing 1.0 BCR. We are pleased to see that, if implemented, the 1.5 BCR will still not be the final determinant, but that there can be choices informed by other values and considerations based on a detailed and transparent process.

On a more trivial editorial note, in 8.2, Other Social Effects is the non-possessive "communities" properly used, or is "community" more appropriate?

Overall, we commend you on this effort to reset the parameters of the Principles and Guidelines as we all struggle for effective management of the water resources within our national, basin, state and local boundaries.

If you should have any questions, please contact me by e-mail at [johines@state.pa.us](mailto:johines@state.pa.us) or by phone at 717-787-5267.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Hines", is written over the typed name and title.

John T. Hines  
Acting Director  
Bureau of Watershed Management